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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

TO: Public Water Systems That Completed Security Vulnerability Assessment

FROM: Robert F. Babcock, Security and Emergency Response Coordinator
Water Bureau

DATE: December 10, 2007

SUBJECT: Phase II of Vulnerability Assessment (VA) Capital Improvement
Program (CIP) Follow-Up by CDM Michigan, Inc.

Phase II of the VA CIP Follow-Up

Thank you for your participation in Phase I of the VA CIP follow-up project and for implementation of your water security program. As a result of your participation in Phase I, your community, the Michigan Department of Environmental Quality (MDEQ), and the national public water supply (PWS) program are better able to demonstrate that water system security has been implemented and is continuing.

Phase II of the VA CIP project consists of follow-up to determine the status of your water system security program. Follow-up includes telephone calls/e-mails to determine new items you have identified and the status of those – completed and waiting for funding. Janice Skadsen of CDM Michigan, Inc., is the project manager for the VA CIP follow-up project and may be contacted at skadsenjm@cdm.com or 734-213-5444, Extension 22109.

Why Participate in Phase II of the VA CIP Follow-up?

Inasmuch as Phase I shows that the public water systems in Michigan have taken the water system security program seriously, it is useful to show the continued improvements that have taken place since the VA was completed. It's beneficial for the community to not only have completed their own projects that resulted from the VA, but also show the continuing security effort subsequent to the VA for new projects that have been identified and the status of implementation.

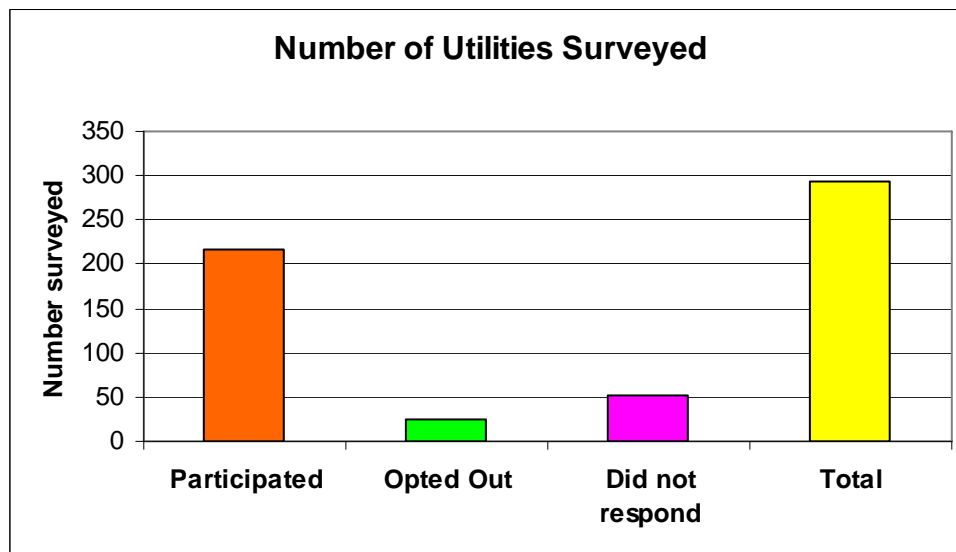
By way of background, the following is information from Phase I of the VA CIP follow-up:

Phase I Utility Response Rate

The initial list supplied by the MDEQ was reviewed and some additional contacts added. A total of 290 utilities were contacted. Of these, six were part of another system and participated as a single unit. Therefore, the final number of potential participants was

293 of which 216 (74 percent) participated in the study (Figure 1). Fifty-one (17 percent) facilities either did not respond or indicated that they would complete the survey but failed to deliver it on time. A total of 25 (9 percent) utilities declined to participate in the survey.

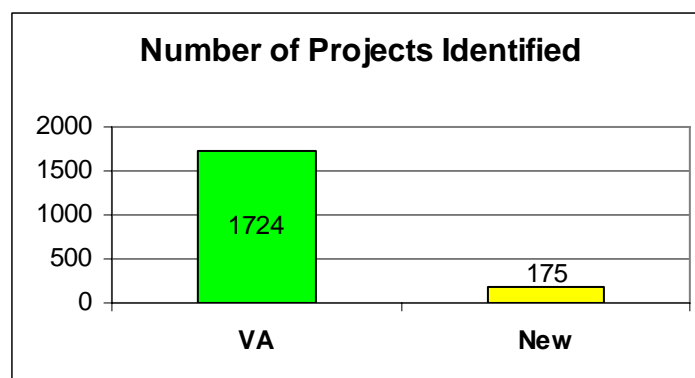
Figure 1: Rate of Utility Participation in Project Survey



Study Conclusions

In Michigan, a total of 1,724 projects were identified in the VAs and 175 post-VA (Figure 2). Michigan water utilities identified a total of 1,899 security projects ranging from the addition of new locks to emergency generators.

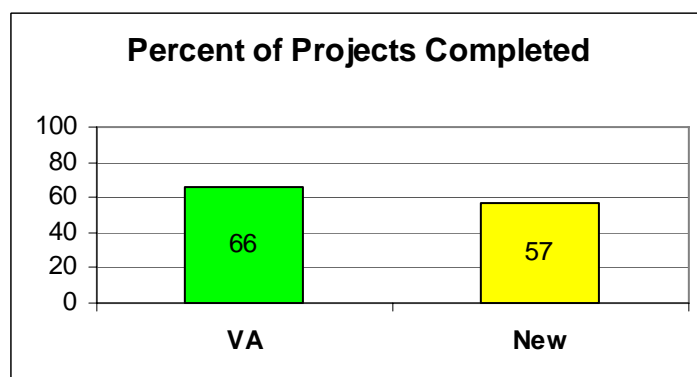
Figure 2: Total Quantity of Security-Related Projects Identified by Michigan Water Utilities from 2002 to 2007



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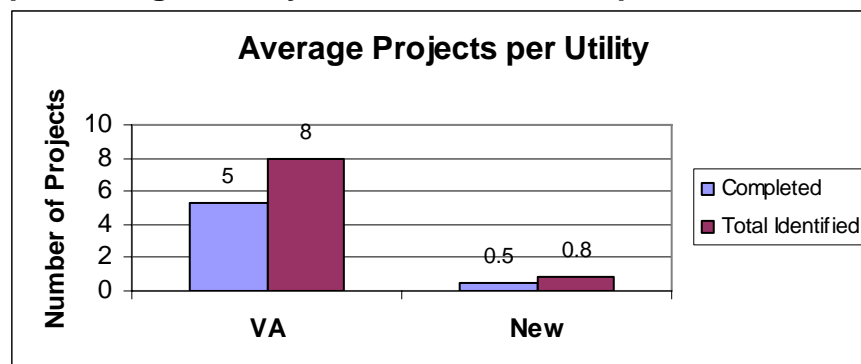
Of these projects, the majority have been completed. Sixty-six percent of the projects identified as part of the VAs have been done and 57 percent of security projects identified at a later date have been accomplished (Figure 3). The most common reasons for not completing projects included lack of funding, lack of staff time, and inability to implement the project (some utilities found that initial plans proved impractical or impossible to complete).

Figure 3: Completion Rate of Security Projects Identified by VA or Post-VA from 2002 to 2007



Therefore, a total of 1,244 security-based projects have been completed to enhance the security of water utilities in Michigan. The data collected indicate that Michigan utilities identified on average eight projects per utility from their VA and completed on average five projects per utility (Figure 4). The utilities continued to identify projects post-VA demonstrating a continued effort in security enhancements. On average, slightly less than one project per utility was identified and completed post-VA.

Figure 4: Average Number of Projects Identified and Completed per Michigan Utility Based on the VA Report and Post-VA



Typical projects included locks, fences, cameras, motion detectors, card key access, and emergency power generators. Project costs ranged from \$100 for new locks to \$5 million for new generators to supply power back-up. Almost all utilities modified their policies and procedures. In addition, many utilities updated their emergency response plans; however, this was often a routine update and not just driven by the VA.

In conclusion, Michigan utilities have been responsive to increased security concerns and have taken a variety of actions to increase the security of their facilities. The utilities are continuing to address and implement security enhancements.

Information Security

As with Phase I information, your PWS will be assigned a random number specifically for this project, and information gathered in the VA CIP follow-up will be generic in nature. No facility-specific capital improvements will be identified.

Schedule

Phase II is scheduled to be completed by December 31, 2008.

Reports

Contract activities will be reported during the contract as well as upon completion of the contract and will include the following:

- Number of VAs
- Number of facility site visits, date, and attendance list by position
- Number of CIP items identified by VAs
- Number of CIP items completed
- Number of CIP items remaining
- Percent of CIP items completed
- Percent of CIP items remaining
- Number of CIP items that, subsequent to VA completion, have been identified for security and have been completed

If you have any questions or comments, please feel free to contact Robert Babcock, Security and Emergency Response Coordinator, Lansing Operations Division, Water Bureau, MDEQ, at 517-373-8566 or babcockr@michigan.gov; or Janice Skadsen, CDM.

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Further public water security information is available on the MDEQ, Water Bureau, Internet Web site at <http://www.michigan.gov/deqwater> (select Water and Wastewater Security from the list on the left).

Attachment

cc: Nick Damato, United States Environmental Protection Agency
James K. Cleland, Chief, Lansing Operations Division, Water Bureau, MDEQ
Water Bureau District Supervisors, MDEQ

A handwritten signature in black ink, reading "Peter F. Balcomb". The signature is written in a cursive style with a long horizontal line extending to the right.

Attachment A: Excerpt from the Michigan Freedom of Information Act, 1976 PA 442,
as Amended

FREEDOM OF INFORMATION ACT (EXCERPT)
Act 442 of 1976

15.243 Exemptions from disclosure; public body as school district or public school academy; withholding of information required by law or in possession of executive office.

Sec. 13. (1) A public body may exempt from disclosure as a public record under this act any of the following:

(y) Records or information of measures designed to protect the security or safety of persons or property, whether public or private, including, but not limited to, building, public works, and **public water supply designs** (emphasis added) to the extent that those designs relate to the ongoing security measures of a public body, capabilities and plans for responding to a violation of the Michigan anti-terrorism act, chapter LXXXIII-A of the Michigan Penal Code, 1931 PA 328, MCL 750.543a to 750.543z, emergency response plans, risk planning documents, threat assessments, and domestic preparedness strategies, unless disclosure would not impair a public body's ability to protect the security or safety of persons or property or unless the public interest in disclosure outweighs the public interest in nondisclosure in the particular instance.